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November 9, 2017

By ECFS

Marlene Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: **Assist Wireless, LLC, Boomerang Wireless, LLC and Easy Telephone Services Company Written *Ex Parte* Presentation; WC Docket Nos. 17-287, 11-42, 09-197**

Dear Ms. Dortch:

Assist Wireless, LLC (Assist), Boomerang Wireless, LLC (Boomerang) and Easy Telephone Services Company d/b/a Easy Wireless (Easy) (collectively, the Companies), through the undersigned counsel, hereby submit this letter in response to the Draft Lifeline Item released by the Commission on October 26, 2017.¹ As explained herein, the Draft Lifeline item, if adopted as currently written, would have a widespread and severe impact on low-income consumers residing on Tribal lands. Indeed, it represents a drastic departure from the Chairman's claims to support affordable broadband for low-income consumers suffering from the digital divide² and could result in massive consumer harm, confusion and service

¹ See *Draft Bridging the Digital Divide for Low-Income Consumers*, WC Docket No. 17-287 et al., Fourth Report and Order, Order on Reconsideration, Memorandum Opinion and Order, Notice of Proposed Rulemaking, and Notice of Inquiry, FCC-CIRC1711-05 (Oct. 26, 2017) (Draft Lifeline Item).

² In a recent statement, Chairman Pai confirmed "I support including broadband in the Lifeline program to help provide affordable, high-speed Internet access for our nation's poorest families." FCC News Release, Statement of FCC Chairman Ajit Pai On the Future of Broadband in the Lifeline Program, Mar 29, 2017. Even in his dissent to the Lifeline Modernization Order, then Commissioner Pai noted his view that "modernizing the Lifeline program to support affordable, high-speed Internet access for our nation's poorest families is a worthy goal." *Lifeline and Link Up Reform and Modernization et al.*, WC Docket No. 11-42 et al., Third Report and Order,

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disconnection – especially on Tribal lands. For the reasons explained below, the Companies respectfully urge the Commission reconsider the proposed rule changes. At a minimum, these issues should be raised and considered in the context of the Notice of Proposed Rulemaking (NPRM) while the Commission conducts the proper and necessary Tribal consultation and engagement with other stakeholders to fully understand the impact of the planned changes on Lifeline-eligible consumers residing on Tribal lands.

The Commission Must Consult With Tribal Nations Prior to Adopting Policy Changes That Will Impact Consumers Residing on Tribal Lands

In the Draft Fourth Report and Order, the Commission proposes to limit enhanced Tribal reimbursements to rural Tribal areas and to subscribers that receive service from facilities-based eligible telecommunications carriers (ETCs).³ These are major changes to the Tribal Lifeline program that require further notice and comment, especially because it appears that the Commission has once again failed to conduct a consultation with the Tribal Nations, in direct violation of long-standing Commission policy.

In its 2000 Tribal Policy Statement, the Commission committed to “consult with Tribal governments prior to implementing any regulatory action or policy that will significantly or uniquely affect Tribal governments, their land and resources.”⁴ Regrettably, while the Commission has remained steadfast in this commitment in other contexts,⁵ it seemingly has forgotten its tribal consultation obligations in recent years with respect to the Lifeline program. Indeed, this is the second time in a row that the Commission has failed to consult with Tribal Nations prior to making significant changes to the Tribal Lifeline program. In 2015, the

Further Report and Order, and Order on Reconsideration, FCC 16-38 (2016) (Lifeline Modernization Order), Dissenting Statement of Commissioner Ajit Pai, 1.

³ See Draft Lifeline Item, ¶¶ 3-9, 21-28.

⁴ *Statement of Policy on Establishing a Government-to-Government Relationship with Indian Tribes*, Policy Statement, FCC 00-207, 4 (June 23, 2000) (2000 Tribal Policy Statement).

⁵ For example, on August 22, 2017, Commission staff from the Office of Native Affairs and Policy (ONAP), the Wireless Telecommunications Bureau, and Chairman Pai and members of his staff held a Tribal consultation to discuss “among other issues, the historic preservation and Tribal review processes currently required to deploy wireless facilities” to which the Commission had proposed changes as part of the new *Accelerating Wireless Broadband Deployment by Removing Barriers to Infrastructure Investment* proceeding. In the announcement for the Tribal consultation, the Commission made clear that staff “look[ed] forward to engaging in a meaningful government-to-government dialogue on these important topics.” See FCC Events, “Tribal Consultation with FCC Chairman Ajit Pai,” available at <https://www.fcc.gov/news-events/events/2017/08/tribal-consultation-fcc-chairman-ajit-pai>.

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Commission announced that it would “depart from the staff’s prior informal guidance and interpret the ‘former reservations in Oklahoma’ within section 54.400(e) of the Commission’s rules as the geographic boundaries reflected in the Historical Map of Oklahoma 1870-1890 (Oklahoma Historical Map).”⁶ The Commission adopted this change without first consulting with the affected Tribes, instead directing the Wireline Competition Bureau and ONAP after-the-fact “to actively seek government-to-government consultation with Tribal Nations in Oklahoma on the efficacy and appropriateness of other maps and geospatial information assets developed both by federal agencies and individual Tribal Nations.”⁷ Many Tribes expressed frustration in response to this consultation process, and they fairly asserted that it was inconsistent with the Commission’s long-standing policy of engaging with Tribes prior to taking action that would impact Tribal Nations.⁸ Importantly, as a result of the Commission staff’s consultation with the Tribe after the 2015 Lifeline Order was adopted, the Commission reversed course in part and decided that “residents of the Cherokee Outlet will remain eligible for enhanced Tribal support.”⁹

The Draft Lifeline Item, which neither suggests that the affected Tribal Nations have been consulted nor indicates that the Commission will seek consultation after adoption, is similarly an affront to Tribal sovereignty.¹⁰ For example, the Draft Lifeline Item presents for the first time – and seemingly without any consideration for the consequences – a construct to limit enhanced Lifeline support to rural Tribal lands based on the E-rate program.¹¹ The Draft Lifeline Item further includes provisions to eliminate resellers from the enhanced Tribal Lifeline

⁶ *Lifeline and Link Up Reform and Modernization et al.*, WC Docket No. 11-42 et al., Second Further Notice of Proposed Rulemaking, Order on Reconsideration, Second Report and Order, and Memorandum Opinion and Order, FCC 15-71, ¶ 257 (2015) (2015 Lifeline Order).

⁷ *Id.*, ¶ 265.

⁸ See, e.g., Statement of Gary Batton, Chief, Choctaw Nation of Oklahoma, WC Docket No. 11-42 et al. (Aug. 7, 2015) (“If the FCC and other federal policy makers had properly followed government-to-government protocols requiring tribal consultation in advance of making a federal policy decision affecting tribal communities, the tribes could have cleared up the FCC’s confusion earlier this year.”); Letter from Bill John Baker, Principal Chief of the Cherokee Nation, to Marlene H. Dortch, Secretary, Federal Communications Commission, WC Docket No. 11-42 et al. (Oct. 21, 2015) (“The lack of consultation prior to the adoption of a new map re-designating and carve out of tribal lands in Oklahoma raises serious concern for future rulemakings that may seek to limit vital Universal Service Funds for tribal lands and residents.”).

⁹ See Lifeline Modernization Order, ¶ 434.

¹⁰ See Letter from Dr. Michael E. Marchand, Chairman, Confederated Tribes of the Colville Reservation, to Hon. Ajit Pai, Chairman, Federal Communications Commission et al., WC Docket Nos. 17-287 et al. (filed Nov. 7, 2017).

¹¹ See Draft Lifeline Item, ¶ 5.

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program.¹² Both of these changes would severely inhibit the ability of low-income consumers residing on Tribal lands to obtain affordable voice and broadband service. The Commission can and should avoid repeating the procedural shortcomings of the 2015 Lifeline Order by considering these proposals as part of a notice and comment rulemaking, and engaging in proper Tribal consultation prior to enacting any significant policy changes.

The Draft Lifeline Item Fails to Analyze How the Changes to the Tribal Lifeline Program Would Impact Low-Income Consumers

As Commissioner Clyburn recently observed, Lifeline is “the only universal service program designed to close the affordability gap.”¹³ Yet, the Draft Lifeline Item noticeably omits any meaningful discussion about how limiting enhanced Tribal reimbursements to rural Tribal areas and to subscribers that receive service from facilities-based ETCs would impact low-income consumers that currently depend on the enhanced Tribal Lifeline benefit for accessing essential voice and broadband services. The Companies respectfully submit that it would be both inappropriate and irresponsible for the Commission to adopt the proposed changes to the Tribal Lifeline program without first completing a robust analysis of how the changes would impact the ability of low-income consumers to access *affordable* voice and broadband services.¹⁴

Eliminating Resellers Would Severely Limit Consumers’ Ability to Obtain Service Through the Tribal Lifeline Program

The Draft Lifeline Item fails to assess the impact of eliminating resellers from the Tribal Lifeline program. Currently, an estimated 55 percent of Tribal Lifeline subscribers (and nearly 62 percent of Tribal wireless Lifeline subscribers)¹⁵ receive their service from resellers. Before

¹² See *id.*, ¶¶ 21-27.

¹³ See “Commissioner Clyburn Statement on FCC Majority’s Lifeline Proposal” (rel. Oct. 27, 2017).

¹⁴ Moreover, as noted by the Companies and other wireless ETCs in a recent *ex parte* filing, the Draft Lifeline Item fails to address the potential legal shortcomings of the decision to depart from more than a decade of precedent of the Commission granting forbearance to Lifeline providers from the “own facilities” requirement in section 214(e)(1)(A), including granting blanket forbearance in 2012, because non-facilities based Lifeline meets the three-part test for forbearance in section 10(a) of the Communications Act. See *Ex Parte* Letter from John J. Heitmann and Joshua Guyan, Counsel to the Lifeline Connects Coalition, Boomerang Wireless, LLC and Easy Wireless, LLC to Marlene H. Dortch, Secretary, Federal Communications Commission, WC Docket Nos. 17-287 et al., 7-8 (Nov. 2, 2017).

¹⁵ According to the USAC Lifeline Disbursement Tool, available at <http://www.usac.org/li/tools/disbursements/default.aspx>.

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adopting the drastic changes proposed in the Draft Lifeline Item, the Commission, at the very least, must inquire about whether affordable voice and broadband services would be available to these consumers if resellers are eliminated.

With respect to wireless service options, Verizon Wireless and T-Mobile have demonstrated little if any interest in the retail Lifeline business¹⁶ and AT&T Wireless has no wireless Lifeline subscribers.¹⁷ While Sprint, through its Virgin Mobile affiliate, does offer retail Lifeline service, it does not participate in the enhanced Lifeline program for residents of Tribal lands. These “nationwide” wireless facilities-based carriers do, however, have existing networks offering coverage on Tribal lands and cost-effectively serve Tribal Lifeline communities through their partnerships with resellers.¹⁸ In many areas on Tribal lands, wireless resellers are the only means for low-income consumers to access affordable wireless voice and broadband services.

Though not an effective alternative to the wireless services that low-income Americans want (just like Americans of greater means), the Draft Lifeline Item fails to examine whether there are comparable and comparably affordable wireline voice and broadband Lifeline service options available in all Tribal areas where resellers currently provide service. And even if one or more wireline provider does serve a particular area on Tribal lands, the Commission also fails to explore, in cases where comparable wireline service offerings may be available, whether Lifeline Tribal residents can afford those services and make arrangements to pay for them on a monthly basis when so many do not have bank accounts or credit cards.

The lack of availability of alternative wireless and wireline services for low-income consumers residing on Tribal lands is not a hypothetical concern. For example, eliminating resellers would essentially eliminate the availability of enhanced Lifeline wireless service for approximately 2,275 subscribers on the Colville Indian Reservation in Washington and the Wind River Reservation in Wyoming currently being served by Boomerang. Additionally, on wide swaths of the Colville Indian Reservation in Washington, for nearly 200 subscribers currently served by Boomerang, no local exchange carrier offers service. Because no facilities-based wireless provider offers retail Lifeline service in these areas, these households would have **no**

¹⁶ See Daniel Fuller, “T-Mobile’s CFO Wants To Get Rid Of Lifeline Program,” AndroidHeadlines (June 9, 2017) available at <https://www.androidheadlines.com/2017/06/t-mobiles-cfo-wants-to-get-rid-of-lifeline-program.html>.

¹⁷ According to the USAC Lifeline Disbursement Tool, available at <http://www.usac.org/li/tools/disbursements/default.aspx>.

¹⁸ Boomerang serves subscribers from over 50 Tribes across 16 states as a wireless reseller of the Verizon network. Easy and Assist provide enhanced Tribal Lifeline service to eligible subscribers in Oklahoma as resellers of the Sprint network.

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options for obtaining voice or broadband service if wireless resellers are eliminated from the Tribal Lifeline program.

Without an affordable alternative for obtaining service, the Commission, if it eliminates wireless resellers from the Tribal Lifeline program, effectively would abandon Tribal consumers for whom this service truly is a “lifeline.” Indeed, a recent survey by one of the Companies of its Tribal Lifeline subscribers, inquiring about the primary uses of the enhanced Tribal Lifeline service, as well as the potential impact of the proposed changes to the Tribal Lifeline program on these subscribers, underscores the importance of the Tribal Lifeline benefit. Of the more than 2,000 respondents, more than 80 percent said they depend on the service to contact 911 or other emergency services, and the majority of respondents indicated that they rely on their Lifeline service to stay in contact with their employer and/or look for a job. The survey also demonstrates the role of the enhanced Tribal Lifeline benefit in promoting affordability – more than 80 percent of survey respondents indicated that if they had to pay an additional \$25.00 per month for their service, they would be forced to reallocate money currently used for food, utilities and other essentials.¹⁹ The Commission’s decision to eliminate resellers from the Tribal Lifeline program would leave low-income residents of Tribal lands with few, if any, alternatives and would severely impact their lives.

The Commission Offers No Analysis of the Impact to Consumers of Limiting Enhanced Lifeline Support to “Rural” Tribal Areas

The Draft Lifeline Item proposes to limit enhanced Lifeline support to “rural” areas, defined using the same criteria as the E-rate program.²⁰ However, even a cursory review of the proposed urban/rural distinction for Tribal lands reveals the potential harms to low-income consumers if this change is adopted. In Alaska, for example, “GCI estimates that as many as two-thirds of Alaska’s Lifeline consumers will lose Tribal Lifeline support.”²¹ And in Oklahoma, an initial analysis indicates that approximately 32,000 subscribers in Muskogee,

¹⁹ Additional information regarding the survey results is provided in **Attachment A** to this letter.

²⁰ See Draft Lifeline Item, ¶ 5.

²¹ *Ex Parte* Letter from John T. Nakahata, Counsel to General Communication, Inc., to Marlene H. Dortch, Secretary, Federal Communications Commission, WC Docket No. 17-287 et al. (Nov. 2, 2017). GCI proposes that “the Commission should phase-down Tribal Lands support in the non-rural areas.” *Id.* While the Companies generally oppose any policy or rule change that would limit the availability of the enhanced Tribal Lifeline benefit in more densely populated areas, a phase-down mechanism such as the one set forth by GCI would be a minimum measure needed “[t]o mitigate the impact on these consumers and to avoid subjecting them to a dramatic flash-cut” if the Commission moves forward with its proposal. *Id.*

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Tulsa and other larger cities currently served by Easy and Assist could lose their enhanced Tribal benefits as well.²² The Draft Lifeline Item attempts to justify this result by noting that “[a]pproximately 98 percent of Americans in urban areas already have access to fixed broadband Internet access service at speeds of 25 Mbps/3 Mbps, including residents of both Tulsa and Reno.”²³ However, as discussed above, fixed broadband services are not an adequate substitute for low-income consumers who depend on mobility and primarily rely on smartphones to access the Internet,²⁴ and should not be confused, with potential affordability.²⁵ The Commission should not summarily deny enhanced Tribal Lifeline benefits to otherwise eligible low-income Tribal residents simply because they do not reside in “rural” areas and may have access to non-Lifeline broadband offerings for which the Commission provides no assessment of affordability.

Eliminating Resellers From the Tribal Lifeline Program Undermines Key Program Objectives

The Draft Lifeline Item concludes – with no rational explanation or record evidence – that “providing the enhanced support to Lifeline providers deploying, building, and maintaining critical last mile infrastructure is a more appropriate way to support the expansion of voice- and broadband-capable networks on Tribal lands.”²⁶ As an initial matter, the Commission’s 2000 Tribal Lifeline Order makes perfectly clear that the “primary goal” of the Tribal Lifeline program is not infrastructure deployment, but rather to “reduce the monthly cost of telecommunications services for qualifying low-income individuals on tribal lands so as to encourage those without service to initiate service and better enable those currently subscribed to

²² It is impossible to accurately discern from the maps distributed with the Draft Lifeline Item (see Draft Lifeline Item, Appendix E) precisely which geographic areas would be considered rural Tribal areas. Thus, it is likely that some affected areas, Tribes, consumers and carriers have been provided with no effective notice of the proposed changes.

²³ Draft Lifeline Item, ¶ 9.

²⁴ “Adults living in poverty (66.3%) and near poverty (59%) were more likely than higher income adults (48.5%) to be living in households with only wireless telephones.” U.S. Department of Health and Human Services, Centers for Disease Control and Prevention, National Center for Health Statistics, *Wireless Substitution: Early Release of Estimates from the National Health Interview Survey*, July-December 2016 at 3 (May 2017).

²⁵ See Letter from Bill John Baker, Cherokee Nation Principal Chief, to Marlene H. Dortch, Secretary, Federal Communications Commission, WC Docket Nos. 17-287 et al. (Nov. 8, 2017) (“Living in an area with a population over 25,000 people does not determine one’s ability to afford phone services.”).

²⁶ See Draft Lifeline Item, ¶ 26.

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maintain service.”²⁷ Other Universal Service Fund programs directly facilitate infrastructure deployment, and indeed, earlier this year, the Commission announced that it would reserve approximately \$340 million of Connect America Fund support to advance the deployment of 4G LTE service on Tribal lands.²⁸ However, even if the Commission seeks to incentivize infrastructure build-out through the Lifeline program, the Draft Lifeline Item’s logic is fundamentally flawed. First, reducing the number of providers in the market as a means of incentivizing facilities-based providers to build infrastructure and offer better service options goes against basic economic principles – namely, that increased competition drives innovation and investment by incumbents.

Second, wireless resellers that provide Lifeline service indirectly spur network deployment and enhancements, including on Tribal lands, by increasing subscribership and adding subscriber lines to, and demand for, the major wireless carrier networks while allowing the network providers to avoid the substantial costs of serving Lifeline subscribers. As Commissioner Clyburn stated, “[w]hen everyone is connected to the networks, then the value of those networks increases.”²⁹ By generating demand, wireless resellers help to improve the business case for facilities-based providers to make investments to achieve more extensive and reliable coverage in Tribal lands. Since most facilities-based wireless providers have not focused on serving low-income Tribal residents,³⁰ the Commission’s proposal to restrict enhanced Tribal Lifeline benefits to facilities-based providers carries with it the very real possibility that more than half of current Tribal Lifeline subscribers could lose their service. That kind of line loss not only would harm consumers, but also would decrease the incentives for facilities-based wholesale providers to improve existing network facilities and to build-out more in Tribal areas because the market would reflect significantly reduced demand and network usage.

Third, there is no indication in the Draft Lifeline Item that the Commission will require facilities-based ETCs to comply with specific build-out requirements, such as those required for recipients of Connect America Fund support.³¹ Moreover, proponents of limiting enhanced

²⁷ See *Federal-State Joint Board on Universal Service et al.*, CC Docket No. 96-45, Twelfth Report and Order, Memorandum Opinion and Order, and Further Notice of Proposed Rulemaking, FCC 00-208, ¶ 44 (2000) (2000 Tribal Order).

²⁸ See *Connect America Fund et al.*, WC Docket No. 10-90 et al., Report and Order and Further Notice of Proposed Rulemaking, FCC 17-11, ¶ 33 (rel. Mar. 7, 2017) (Mobility Fund Phase II Order).

²⁹ See Lifeline Reform Order, Statement of Commissioner Mignon L. Clyburn Approving in Part, Concurring in Part.

³⁰ See *supra*, n. 16 and 17.

³¹ See, e.g., Mobility Fund Phase II Order, ¶¶ 94-100.

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Tribal Lifeline support to facilities-based ETCs offer no meaningful evidence that the presence of resellers inhibits their ability to deploy or expand networks, nor do they claim that receiving “100 percent of the support” would expedite network infrastructure deployment or improvement, as the Draft Lifeline Item suggests.³² Thus, eliminating resellers from the Tribal Lifeline program would not guarantee the expansion and improvement of network infrastructure on Tribal lands. It would, however, have one certain result: a significant reduction in service for low-income consumers residing on Tribal lands.

We look forward to working with the full Commission and all stakeholders to fully evaluate the impact of these proposals as part of a notice and comment rulemaking while the Commission conducts the required Tribal consultation.

³² See, e.g., *Ex Parte* Letter from David A. LaFuria and Steven M. Chernoff, Counsel for Smith Bagley, Inc., to Marlene H. Dortch, Secretary, Federal Communications Commission, WC Docket No. 11-42 et al. (Oct. 20, 2017).

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Pursuant to Section 1.1206(b) of the Commission's rules, this letter is being filed electronically.

Respectfully submitted,



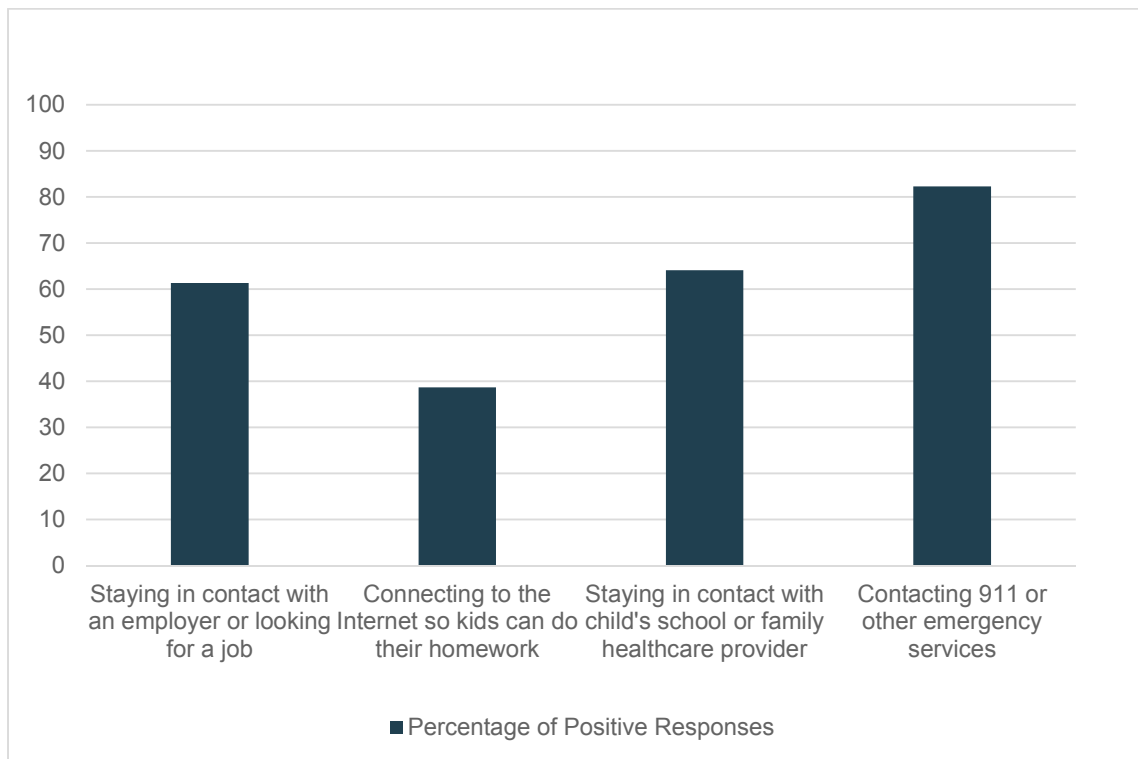
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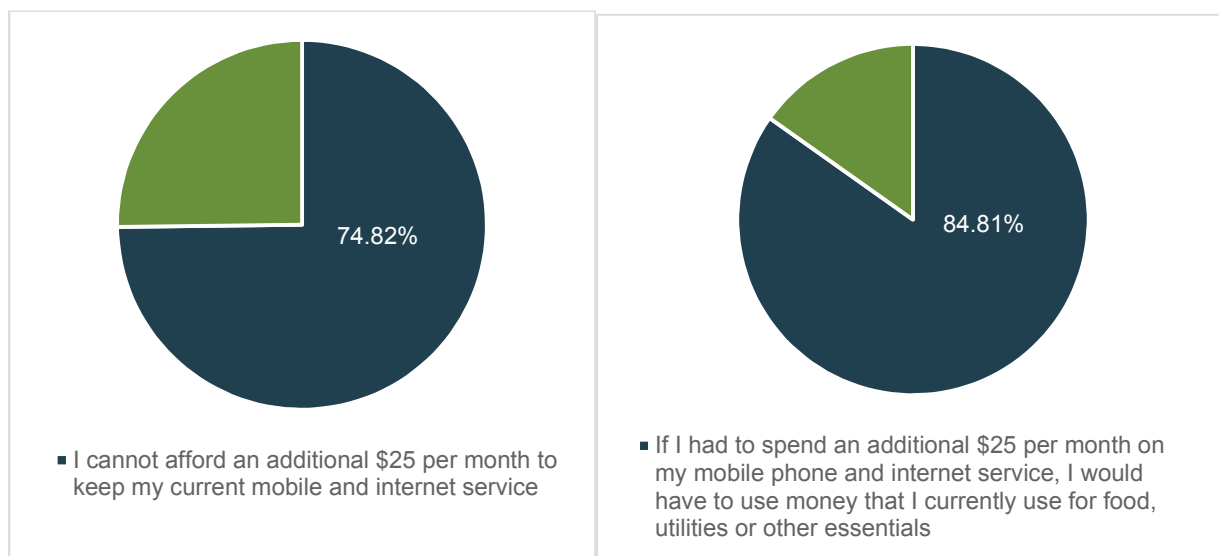
ATTACHMENT A

Tribal Lifeline Support Uses



Source: Assist Wireless Consumer Survey (2,175 responses received 10/31/17 – 11/6/17)

Tribal Lifeline Support Affordability



Source: Assist Wireless Consumer Survey (2,212 responses received 10/31/17 – 11/6/17)

This lifeline helps me stay in constant contact with my child's primary care physician, and my only access to the internet to complete online courses for WIC benefits. It also provides access to other information I may need to access for the benefit of my child.

If I didn't have the service I have it would turn our lives upside down. For one, I am a single parent of two and if we had an emergency at home I would have to walk 3 miles to the nearest neighbor for help because I do not have my own vehicle.

It helps me a lot cause I can't afford a home phone.

I have medical issues and need it to get help when I fall or need an ambulance.

I would not have a telephone without lifeline.

Lifeline is essential to my daily life. It is the only reason I was able to acquire a job in order to feed my children and keep the bills paid.

I've been filling out job applications and need a phone in case they call for an interview.

It's the only access to a phone or internet we have.

It's helped keep me in contact during job searches and also when needing to apply for jobs online, I don't have to run around looking for internet access.

This assistance has made it possible for me to be in touch with someone when an emergency happens with my grandchildren.

Consumer Comments on the Importance of the Enhanced Tribal Lifeline Benefit

This lifeline is literally what it says. I'm homeless and can't afford anything else. If something happened, how would my family find me?

The Lifeline service is exactly that for me and my husband. We are elderly and disabled with few connections for help in an emergency and for many of our health needs. We are able with the lifeline service to order our medication refills and receiving them by mail rather than getting a ride for up to thirty miles to get or to order medicine refills.

I'm on Social Security Disability, limited income with health issues. Thankfully I had my Lifeline phone the day I had a heart attack to call an ambulance that saved my life.

Having a cell phone is not a luxury anymore, it's a necessity. This is my lifeline.

I would be unemployed without this phone.

Lifeline has been a saving grace for my family.

Lifeline is very helpful because I cannot afford a contract phone line.

I need this phone and Internet services for job searching and kids' online schooling....

I have no car and live in a rural area; it's my only way to get help in an emergency.

I need this phone to keep going. I use my phone to keep in touch with schools and employment, to call my utility companies. And I can't afford even a home phone right now.

If it was not for my lifeline, I would not have a phone.

I am a nursing student and I am a single parent and I cannot afford a regular phone bill at this time.

I live in a rural area and have little access to town. I am elderly and have ongoing health conditions. My service is essential to my well-being.